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August 22, 2022

Via ECF

Hon. Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Jerez v. Goodwill Industries of Greater New York and Northern New Jersey, Inc.*
Case No. 20-cv-5875 (HG)(RML)

Dear Judge Levy:

This firm represents Plaintiff in the above-referenced matter. We write, jointly with counsel for Defendants, to inform the Court that the parties have reached a settlement in principle.

As the settlement with Defendant City of New York (the "City") includes a release of Plaintiff's claims under the Fair Labor Standards Act ("FLSA"), the parties respectfully request four weeks, until September 19, 2022, to finalize and submit the settlement agreement for the Court's review and judicial approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. Aug. 7, 2015).

Plaintiff has also reached a settlement in principle with Defendant Goodwill Industries of Greater New York and Northern New Jersey, Inc. ("Goodwill") and the parties are in the process of preparing a settlement agreement. As Plaintiff did not bring any FLSA claims against Goodwill, this settlement agreement will not include a release under the FLSA.

Given the contemplated settlements, the parties further respectfully request that all dates and deadlines be adjourned *sine die*, including but not limited to the August 31, 2022 fact discovery deadline and the status conference scheduled for September 13, 2022 at 1:30 p.m. After the settlement agreement with the City is approved by the Court, Plaintiff intends on filing a stipulation of dismissal for all claims against both Defendants.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Angela Kwon

cc: all parties via ECF